

EXHIBIT D

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING,
INC.,

Defendants.

_____/

WAYMO HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF DON BURNETTE

SAN FRANCISCO, CALIFORNIA

FRIDAY, AUGUST 18, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2681032

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1 unethetical to bring confidential or proprietary 10:06
2 information from a former employer to your new 10:06
3 company; right? 10:06
4 MR. LIN: Objection; form. 10:06
5 MS. HARTNETT: Objection. 10:06
6 THE WITNESS: Yes, it would be wrong. 10:06
7 MR. JUDAH: Q. Did you ever use a personal 10:06
8 laptop at Ottomoto? 10:06
9 A No. 10:06
10 Q Do you ever use a personal laptop for work at 10:06
11 Uber? 10:06
12 A No. 10:06
13 Q Have you ever seen Anthony Levandowski use a 10:06
14 personal laptop while working for Otto? 10:06
15 A No. 10:06
16 MS. HARTNETT: Objection. 10:06
17 MR. JUDAH: Q. When were you issued an Otto 10:06
18 computer? 10:06
19 A When I got there. I'm not sure what the date 10:06
20 was. 10:06
21 Q When were you issued an Uber computer? 10:06
22 A Sometime after the acquisition. For a while 10:07
23 I continued to use my Otto computer. 10:07
24 Q Could you briefly describe your educational 10:07
25 background. 10:07

CERTIFICATE OF REPORTER

I, ANDREA M. IGNACIO, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition was taken in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by computer, under my direction and supervision;

That before completion of the deposition, review of the transcript [x] was [] was not requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

Dated: August 18, 2017



ANDREA M. IGNACIO,
RPR, CRR, CCRR, CLR, CSR No. 9830